



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 4 2013

Ms. Debbie Cress
NEPA Project Manager
Tonto National Forest Supervisor's Office
2324 East McDowell Road
Phoenix, Arizona 85006

Subject: Draft Environmental Impact Statement for the Salt River Allotments Vegetative Management Project, Gila County, Arizona (CEQ # 20130041)

Dear Ms. Cress:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Salt River Allotments Vegetative Management Project (Project) pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

According to the DEIS, the Preferred Alternative would allow new grazing along the Salt River corridor and other riparian areas, and increase grazing in the Sonoran Desert allotments. The Salt River is currently impaired for suspended sediment, nitrogen, phosphorus, and *E. coli*, partly—as described in Arizona Department of Environmental Quality's 2012 Nonpoint Source Annual Report—as a result of past and ongoing grazing. The anticipated significant adverse environmental impacts of the Preferred Alternative, as described in the DEIS, would likely contribute to further degradation of water quality in the River, its tributaries, and numerous springs.

The DEIS also indicates that the Preferred Alternative would result in significant adverse environmental impacts to riparian habitat and threatened and endangered species from grazing along the Salt River and riparian areas in upper Oak Creek Mesa, as well as significant adverse environmental impacts to allotments located in the Sonoran Desert. No supporting information is provided to explain why an expansion of grazing is being proposed in a region with soil and streams long stressed from livestock activities.

Based on our review of the DEIS, we have rated the Preferred Alternative and the document as EO-2, Environmental Objections – Insufficient Information (see enclosed EPA Rating Definitions). We recommend that the Forest Service select Alternative 4 – Wildlife Habitat Optimization—an alternative that would not allow grazing along the Salt River Corridor and Upper Oak Creek Mesa Pasture, and was created in response to concerns expressed through comments received during scoping. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. We would also like to thank you for agreeing, with Jason Gerdes of my staff, to a one-week extension for the EPA to submit comments for this EIS. If you have any questions, please contact me at 415-972-3521, or contact Jason, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,



Enrique Manzanilla, Director
Communities and Ecosystems Division

Enclosures: Summary of the EPA Rating System
EPA Detailed Comments

cc: Jason Sutter, TMDL Unit Supervisor, Arizona Department of Environmental Quality (ADEQ)
Krista Osterberg, Grants and Outreach Supervisor, ADEQ
Linda Taunt, Deputy Director, Water Quality Division, ADEQ
Brenda Begay, Program Director, Environmental Protection Office, White Mountain Apache Tribe
Loretta Stone, Director, San Carlos Environmental Protection Agency, San Carlos Apache Tribe

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Grazing in Riparian Areas

Riparian Vegetation and Habitat

The EPA has significant concerns about the access, proposed in the Preferred Alternative (Alternative 3), of livestock to the Salt River and riparian areas in upper Oak Creek Mesa. The Draft Environmental Impact Statement (DEIS) details several expected effects associated with allowing grazing in these areas. Among the most damaging are the projected impacts to riparian vegetation and habitat crucial to sustaining sensitive species, effects that would manifest because of the congregation of livestock on small beaches. Under the Preferred Alternative, 51 miles of Upper Salt River drainage, 65 key riparian stream reaches, and 187 existing springs would be available for grazing. Current management excludes the Upper Salt from grazing, and has 50 key riparian stream reaches and 154 existing springs available for grazing (p. 179). The DEIS states that habitat quality, under this alternative, would decline “moderately to substantially” along almost all key stream reaches, and that the primary reasons for the expected declines include “substantially increased numbers of livestock on some allotments” (p. 180). Additionally, the DEIS states that most stream channels on the allotments are already in “impaired or unstable condition” (p. 95), and that “riparian areas and springs have been relied upon as the primary source of livestock water for many years causing stream channels and adjacent riparian areas to receive concentrated grazing pressure” (p. 99). The DEIS forecasts that, because of livestock concentration, “recovering native vegetation along the river is unlikely even with the implementation of vegetation management tools” (p. 30), and that “due to the nature of the Salt River corridor and the difficulty in monitoring it, riparian vegetation on beach areas where cattle tend to congregate would be unlikely to meet the intent of the Tonto NF Plan” (p. 107).

Sensitive Species

The projected impacts to riparian habitat detailed above would also have significant effects on several sensitive species, including “potential adverse effects to Mexican spotted owl, Southwestern willow flycatcher, Chiricahua leopard frog habitat, Blumer’s dock, and Arizona bugbane.” The Preferred Alternative, because it includes the proposed use of the Upper Salt River, Roosevelt Lake, and other riparian areas, may have significant effects on the Southwestern willow flycatcher and its critical habitat (p. 168), and “direct impact on habitat conditions required for successful nesting/reproduction and with recruitment of new habitat for Southwestern willow flycatcher, yellow-billed cuckoo, Chiricahua leopard frog, and Mexican spotted owl.” Finally, the DEIS states that the proposed action would “affect the largest size and intensity of effects on riparian wildlife habitat compared with other projects alternatives,” and, most concerning, “does not comply with terms and conditions outlined in a biological opinion for the Tonto NF Plan” (p. 180).

Water Quality

In addition to the impacts expected to riparian habitat and sensitive species, grazing in riparian areas may further degrade the water quality of the Salt River. The DEIS states that the Salt River is currently impaired for suspended sediment, nitrogen, phosphorus, and *E. coli* (p. 98). ADEQ’s 2012 Nonpoint Source Annual Report lists grazing, and stream bank and channel destabilization, among others, as potential sources contributing to the water quality impairment of the Salt River from Pinal Creek to Roosevelt Lake (http://www.azdeq.gov/environ/water/watershed/download/nsp_ar-2012.pdf). The EPA

is concerned that allowing additional grazing throughout the watershed would further degrade water quality in the already impaired Salt River. The EPA is also concerned that riparian vegetation would be significantly impacted and this would result in increased runoff, which contributes to water quality impairments.

Grazing near the Salt River is also likely to contribute to exceedances of the *E.coli* water quality standard and may cause health concerns for rafters and recreational users and further impair water quality. The currently approved Full Body Contact (FBC) water quality standard for the Salt River for *E.coli* is 235 cfu/100 ml as a single sample maximum (126 cfu/100 ml also applicable as a 30-day geometric mean). AZ DEQ has listed the Salt River as impaired for *E. coli*. Significantly high *E.coli* levels of 1800 cfu/100 ml, 7100 cfu/100 ml and 1600 cfu/100 ml were noted in 2005, 2006 and 2007, respectively, in Arizona's Integrated 305(b) Assessment and 303(d) Listing Report (<http://www.azdeq.gov/environ/water/assessment/download/bw.pdf>).

The DEIS states that effectiveness monitoring would occur at least once over the ten-year term of the grazing authorization or more frequently, if deemed necessary (p. 23). Monitoring for effects on water quality is not mentioned. It is unclear whether monitoring for potential water quality effects due to grazing, increased runoff, and additional piping of water away from streams and springs for livestock use would take place under Alternative 3 or any of the other alternatives.

Wild and Scenic River Designation

Allowing grazing along the Salt River would negatively affect recreation and the Salt River's Wild and Scenic River designation eligibility. The DEIS states that the increased distribution and higher numbers of livestock along the Salt River would have "undesirable impacts to river corridor, scenery, and wildlife viewing opportunities," and an "adverse effect to Outstandingly Remarkable Values" that may affect its proposed Wild and Scenic River designation (p. 31).

The increased distribution and higher numbers of livestock along the Salt River, proposed in the Preferred Alternative, and the expected subsequent impacts to riparian habitat, sensitive species, water quality, and recreation, detailed above, seem to contradict the tenets of the Integrated Resource Restoration program under which, according to the DEIS, Region 3 (of the Forest Service) is currently enrolled in a pilot. The DEIS states that there are two wilderness areas (including the Salt River) that have threatened plants and animal species and would benefit from a watershed restoration approach, and that "we have a rare opportunity to put the resource before other management activities" (p. 121). The Preferred Alternative, however, as described in the DEIS, appears to put grazing activities before protection and restoration of the Salt River and other riparian areas. The alternative that would more successfully put "the resource before other management activities" would be Alternative 4, the Wildlife Habitat Optimization alternative, which calls for, among other safeguards, no grazing along the Salt River corridor and Upper Oak Mesa Pasture, no grazing in key riparian reaches, and would change the grazing strategy to seasonal winter/spring use across the entire landscape (p. 22)

Recommendations:

The Forest Service should reconsider its proposal to allow new grazing along the Salt River corridor, Upper Oak Creek Mesa Pasture, and other riparian areas, in light of the substantial environmental damage that would result from such action. We recommend that the Forest Service adopt Alternative 4, the Wildlife Habitat Optimization alternative, as the new Preferred Alternative.

Impacts to Sonoran Desert Allotments

In addition to the considerable impacts in riparian areas, the Preferred Alternative would also significantly affect the allotments located within the Sonoran Desert. The DEIS states that past grazing actions in these allotments have resulted in "soil erosion and compaction while current management has, in some cases, prevented or slowed recovery" (p. 137). Additionally, habitat quality is described as "in poor condition throughout the analysis area due to historical use by cattle" (p. 134). The Preferred Alternative proposes to increase cattle numbers on three allotments, which the DEIS states may have "magnified impacts on the land when compared with current management" (p. 140). The Preferred Alternative is also described as most likely to "impede growth or decrease cover of biological crusts" for grazing allotments within the Sonoran Desert, and would have a "significantly greater undesirable effect on biological crust development" than current management (p. 85).

Recommendation:

The Forest Service should adopt the grazing limits proposed in Alternative 4, which proposes grazing on 5,600 fewer acres of Sonoran Desert vegetation than the Preferred Alternative, and would shorten the grazing season from yearlong to seasonal.

